

Exhibit C

DAVIS COUNTY JAIL
Watch Commander

Name: ANGEL CHRISTOPHER **Inmate ID#:** 398403
ABREU

Date: 09/14/2020

Housing Unit: Q-21;DCCF;POD6;
QUEBEC

Inmate Request:

09/14/2020 10:18:14

im documenting a complaint against deputy olsen(the younger one) who worked 9/11/20 on friday. There has been a few shifts olsen has worked in the same section as me and every time he has worked i have been harrassed and profiled by him. The worse has been on 9/11. The shift started with me asking for tp and him popping my door at 6am to search my cell and see if i had somo. thats very extra. im grown and dont need to play hideand seek with tp. Later that morning i had a doctors app and when i walked out the section i was told to remove my muslim religion necklace and told i cant wear it. ive never had a problem wearing the necklace with any deputy before this. but i have had multiple problems with the jail accepting my religion and this adds to that. Also while we walked to medical olsen kept making unnecessary comments and commands such as; telling me to put my hands behind my back when they already were, telling me to walk faster and then telling me to slow down, telling me to clip my ID to my shirt as it was in my pocket and when i told him i didnt have a clip he made a big deal of it, also i was damn near stripped searched before he let me go to medical and made me take my shoes and socks off in the middle of the hallway, also after my app i wasnt in the best mood due to the news i got from the dr and i was keeping to myself. olsen continued to harrass me and even sarcastically asked me what is such a big deal with you. i told him i didnt get good news and would rather keep to myself but he still kept pressing me. ultimately this made me not even want to seek the medical treatment i need and it makes me feel very uncomfortable the way he talks to and treated me all the way down to the way he grabbed me in certain places during the search. id appreciate it if he chilled out

Inmate Signature/Date: _____

Staff Response:

11/26/2020 4:21:09

This has been addressed. I apologize for my extended response, this barely showed up in the system for some odd reason.

Staff Signature/Date: _____

Davis County Sheriff's Office
 Correctional Division
Inmate Request and Grievance Form

Name 43-202-25 Inmate # 3425-25 Housing Unit 55

Date _____ Check One: Request Inmate Grievance Good Time Disciplinary Appeal Other

Describe Problem or Request: Want to speak with my lawyer

Department Use Only

Received by D.P. GIFFORD Date 11/23/2020 Time 11:45

Routed to: Programs

Reply: For your consideration, you will have the opportunity to take a videotaped look at your lawyer, if you so desire. You might be taken to the office, or the office might come to you.

Disposition by: DP GIFFORD Date 11-20-20 Time 13:00

Returned to Inmate by: _____ Date _____ Time _____

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Davis County Sheriff's Office
Correctional Division
Inmate Request and Grievance Form

Name John Doe Inmate # 3456789 Housing Unit 101

Date 12/15/2012 Check One: Request Inmate Grievance Good Time Disciplinary Appeal Other

Department Use Only

Received by Asha, Date 11/18/2020 Time 23:59

Routed to: _____

Reply: I suggest ~~that~~ ^{9.9.1} you may arrange a through-life ~~for~~ ^{for} T.C. ~~which~~ ^{which} will prove to be of the ~~most~~ ^{most} advantage. ~~you~~ ^{you} may ~~arrange~~ ^{arrange} a Non-Contingent U.S.T.

Disposition by: SGJ Date 11-9-02 Time 8:39

Returned to Inmate by: ESL Date 10/1/2011 Time 2:52:25

Original - Classification File Yellow - Inmate w/response Pink - Inmate
DCJ Form 501a (revised 02-29-96)

• Refuse my Prayer But AND
HALAL TRAITS OR TO ACKNOWLEDGE
ME AS MUSLIM

BUT VALENCIA AND NEVER ASKED MY RELIGION WHEN I WAS BOOKEO.

Davis County Sheriff's Office
Correctional Division
Inmate Request and Grievance Form

Name ANGEL ARZEL Inmate # 398403 Housing Unit F-11

Date 11/22/20 Check One: Request Informal Grievance Good Time Disciplinary Appeal Other

Describe Problem or Request: SLT. TOWNEEND, I REALLY DONT WANT TO KEEP GOING BACK AND FORTH ABOUT THIS JUST AS MUCH AS YOU. BUT I WONT STOP UNTIL YOU APPROVE OF MY RELIGION AND ALLOW ME TO PRACTICE SUCH WITH THE PROPER ACCOMMODATIONS. I READ THE INMATE HANDBOOK AND NO WHERE IN THERE OR ON YOUR MEAL PLAN REQUEST FORM DOES IT SAY I HAVE TO TELL YOU MY RELIGION WHEN BEING BOOKED TO RECEIVE ACCEPTABLE FOOD, OR TO GET WHAT IUE. Department Use Only BEEN ASKING FOR, NOT ONLY THAT

Received by: [REDACTED] Date: 11/23/2020 Time: 11:45
Routed to: PROGRAMS

Reply: Per our conversation, you will have the opportunity to take a proficiency test for OPMR 301 this year. You will be located in library 2nd floor
Disposition by: [REDACTED] Date 11-30-20 Time 13:00

Disposition by: _____ Date 11-30-20 Time 1300
Returned to Inmate by: _____ Date _____ Time _____

Original - Classification File Writer - Form 1040 (Rev. 1-29-94) File - Income
OCJ Form 301a (reviced 02-29-94)

Time 13:00
Time _____

THE JOURNAL OF CLIMATE

INMATE COPY

APPRECIATE IF YOU ACCOMMODATED ME. YOU SAY YOU WONT BECAUSE I DIDNT SAY
 I WAS MUSLIM WHEN I WAS PLACED INTO DATE, WHICH IS A FACT MATTER BUT NOT DO F11
 I RECALL THE OFFICER WITH BOOKED ME Correctional Division ASKING ABOUT MY RELIGION.

Inmate Request and Grievance Form

Name ANSEL ASSEG Inmate # 398403 Housing Unit F-11

Date 11/18/20 Check One: Request Inmate Grievance Good Time Disciplinary Appeal Other

Describe Problem or Request: IT HAS BEEN CLOSE TO A YEAR SINCE YOU'VE MENTIONED THAT YOU WOULD
 LOOK FOR AN IMAN TO COME SPEAK WITH YOU TO VERIFY MY DECLARATION OF FAITH TOWARDS ISLAM AND MY
 RELIEF IN ALLAH BEING THE ONE AND TRUE GOD. I WOULD LIKE TO KNOW IF YOU'VE DONE AS YOU SAID
 SO I CAN FINALLY GET ON THE PROPER DIET AND RECEIVE A PRAYER TOWEL/PLUG. WE GAVE
 IT SOME TIME BECAUSE I WAS GETTING NO WHERE WITH YOU DEPOT REGARDING THIS BUT
 NOTHING HAS CHANGED ABOUT ME Department Use Only RELIGIOUS STATE AND TO RELIGIOUS

Received by ██████████ Date 11/18/2020 Time 23:29
 Routed to: PROGRAMS

Reply: I specifically TELL YOU MAY ARRANGE A THROUGH THE GATE
 VISIT (WHICH YOU WILL HAVE TO BE ON THE MAXIMUM).
 YOU MAY ARRANGE A NON CONTACT RELIGIOUS VISIT

Disposition by: ██████████ Date 11/19/2020 Time 06:39
 Returned to Inmate by: ██████████ Date 11/19/2020 Time 07:25

Original - Classification File: Waller - Inmate Information File - Inmate
 DCI Form 501a (printed 02-25-94)

RELIGIOUS

INMATE COPY

CLAIM THREE

I. Plaintiff(s)

Plaintiff Angel Abreu, is and at all times mentioned herein a pretrial detainee of the Davis County Correctional Facility. Abreu is currently confined at Davis County Correctional Facility, in Davis County.

II. Defendant(s)

Please refer to the "I. THE PARTIES TO THIS COMPLAINT" for exact information on defendants.

Defendants are Dr. Woods, Cole McHorn and Lt. Jensen.

Meldrum and Jensen sued individually and in their official capacity. Woods is sued individually unless or until it is determined policy violated rights then Woods will also be sued in his official capacity. The Plaintiff has argued Woods is employed by a private contract but is still trying to get information on what company he works for to get policy information to prove Woods violated rights.

At all times mentioned in this complaint each defendant acted under color of law.

III. Violations(s)

1. US Const. Amendment 8 (further guarantees in Criminal Case)
2. US Const. Amendment 8 Amendment 8 (Rights guaranteed 3. US Const. Amendment 8 Amendment XIII
4. FACTS INNOCENT IN VITRO

1. On September 26, 2020 at around 1912 hours in the Quebec Housing Unit during a cell extraction the Plaintiff received bodily injuries from restrictions. (Review Court one from CLAIM ONE for details of injury)

2. The injury inflicted damaged the nerves in both the Plaintiff's hands.

3. On 9/27/20 at around 2010 hours the Plaintiff reported to Nurse Ahab that he lost the feeling in his hands after hours spent cutting off the circulation due to hand cuffs not being locked the day before. (REF. EXHIBIT)

4. On 10/2/20 Plaintiff was seen by a doctor for his injury and it was determined by the physician that the Plaintiff was suffering from paraesthesia from the handcuffs being applied. (REF. EXHIBIT) It's important to note that after

IV. Facts (PAGE 2)

the narrative was submitted in the system from that doctors visit, it was found later around 9/9/21 from Nurse Abreu that the plaintiff was put on a "Doctor Woods only" patient list and every visit since with Dr. Woods was not submitted into the system but was documented by the plaintiff through grievances and most copies exist but Abreu was refused copies by Lt. Johnson. 5. Ref. Exhibit F page 2 "chief complaint" states the plaintiff being handicapped since they were applied while at the Davis Hospital. 6. Ref. Exhibit C can be viewed to see a pattern of denied medical care and denied adequate medical care. Also refers to Exhibit F and Paragraphs 28-33 from "Accommodations" in CLAIM ONE which the plaintiff realities and incorporates here.

7. From 10/2/20 to 9/9/21 Abreu was on a "Dr. Woods only" list and the plaintiff not only received delayed treatment because of this such as 4/30/21 medical kit where Abreu had to wait to be put on the list to be seen specifically by Dr. Woods who only works on Mondays instead of other doctors who work Tuesdays-Fridays. But Abreu also wrote many grievances relating his problems with Woods and how he did not want to be seen by him at all. The plaintiff discussed this with Lt. Johnson on 11/30/20 (Ref. exhibit H) and Lt. Johnson didn't even remember what was talked about nor did he do anything about it. It was discussed how the plaintiff's hands still remained numb and a nerve conduction study was needed, as mentioned by the first doctor seen, but Woods denied such. The problems with getting proper treatment from medical, how the problems with the plaintiff's hands was getting worse to the point where he couldn't read or write for longer than few minutes without pain shooting up his arm, how he was being refused any physical therapy, and how Woods varied his voice

WITNESSES (Plaintiff's)

at Abren during a appointment (was all mentioned to Jensen also mentioned) was how Woods kept pushing the appointments out saying "things like this just need time to heal" and the problem was getting worse not better meanwhile. And it was expressed to Jensen that Abren wanted to see a different doctor than Woods. 8. Today, 12/20/21, the plaintiff's hands are still numb and the pain that shoots up his arms still exists.

9. On 10/13/20 the plaintiff wrote a grievance about his hands (Ref. Exhibit 1) and them being numb.

10. On 9/29/20 the plaintiff wrote a grievance about his hands being numb and how they lost circulation for so long (Ref. Exhibit 1) And it was mentioned that Abren was waiting longer than usual to be seen by a doctor.

11. There are many more grievances that exist and that Abren filed. But they haven't been made available for this complaint by the Jail Records Division. The plaintiff has not been seen by a doctor for this since his last visit around January 2021, when Woods told him there was nothing he could do for the plaintiff. Dr. Woods is the head physician at Davis County Jail and that has made it impossible to go around him. Now the plaintiff suffers from permanent numbness and pain in both hands.

V. VIOLATION(S) SUPPORTING CLAIM

COUNT SIX: DENIAL OF MEDICAL CARE

While suffering from nerve damage due to restraints and paroxysms in both hands, and requiring medical care for the injuries, the defendants refused to see the plaintiff, or to seek medical intervention and care or provide treatment while acting deliberately indifferent causing permanent damage.

VI. EXHAUSTION OF ADMINISTRATIVE REMEDIES

Refer to "EXHAUSTION OF ADMINISTRATIVE REMEDIES FOR ALL CLAIMS"

VII. CLAIMS FOR RELIEF

The actions of the defendants, Meldrum, Jensen and Woods, is

III. REQUESTS FOR RELIEF (Page 2)

denying plaintiff to medical attention, and failing to offer adequate medical treatment, were done sadistically and maliciously and constituted cruel and unusual punishment in violation of the Eighth Amendment of the U.S. Constitution along with the Fourteenth and the Thirteenth Amendments. The plaintiff alleges and incorporates by reference paragraphs 1-11 of "IV. FACTS".

VIII. RELIEF REQUESTED

WHEREFORE, plaintiff requests that the court grant the following relief:

A. Issue a declaratory judgment stating that:

1. The actions of the defendants Meldrum, Jenson, and Woods violated the plaintiff's rights under the Eighth Amendment of the United States Constitution.
2. A Separate Judgment, The actions of the defendants Meldrum, Jenson, and Woods, violated the plaintiff's rights under the 14th and Thirteenth Amendments of the United States Constitution.

B. Award compensatory damages in the following amounts:

1. \$5,000 monthly and severally against defendants Meldrum, Woods, and Jenson, for the denial of medical attention and failing to offer adequate medical attention or treatment that resulted in the plaintiff's permanent paresthesias in his hands.

C. Award punitive damages in the following amounts:

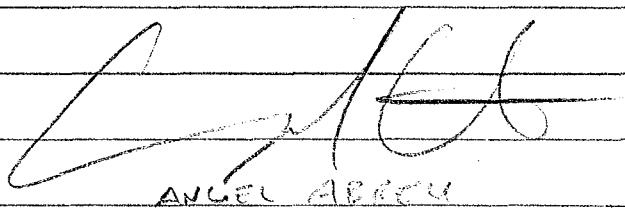
1. 10,000 each against defendants Meldrum, Woods and Jenson.

D. Award discretionary damages as it may appear plaintiff is entitled.

E. Award future damages (as expected pain and suffering, loss or impairment of earning capacity) and projected medical expenses as it may appear plaintiff is entitled.

F. Grant such other relief as it may appear plaintiff is entitled.

20, DECEMBER 2021
Respectfully submitted


ANGEL ACEVES